

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Mary E. Rubenstein		Chapter 13 Proceeding
	Debtor(s)	19-13824 MDC
WELLS FARGO BANK, N.A.		
	Movant	
v. Mary E. Rubenstein and Kenneth E. West		
	Respondents	

OBJECTION TO DEBTOR'S MOTION TO AMEND PLAN

WELLS FARGO BANK, N.A. (Movant), a secured creditor in this case objects to the confirmation of the Debtor's 6TH Amended Chapter 13 Plan dated 8/31/2022 and states the following:

1. The Stipulation filed with the this Court on 10/3/2022 at Doc. 181, required the Debtor to file an amended plan that, in addition to providing for the pre-petition arrears as outlined in Claim 5-2, the Debtor would also provide for the missed post petition payments in the amount of \$7,852.16. The plan was to be amended within 30 days, and has not been completed thus far. A copy of the Order is attached hereto as Exhibit "A".

WHEREFORE, WELLS FARGO BANK, N.A. respectfully requests that Debtor's Motion to Amend the Plan, specifically the 6th Amended Plan dated 8/31/2022 be denied.

Respectfully Submitted,

/s/ Jill Manuel-Coughlin, Esquire

POWERS KIRN, LLC

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Dated: November 2, 2022